

David Edelberg, Esq.
SCARINCI & HOLLENBECK, LLC
150 Clove Road, 9th Floor
Little Falls, New Jersey 07424
(201) 896-7701 (Tel)
(201) 896-7084 (Fax)
dedelberg@sh-law.com
Attorneys to ADP TotalSource, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MENOTTI ENTERPRISE, LLC,

Debtor.

Chapter 11 (Subchapter V)

Case No.: 24-22242-SHL

**ORDER TO SHOW CAUSE SEEKING ENTRY OF AN ORDER SCHEDULING A
SHORTENED HEARING DATE ON ADP TOTALSOURCE'S APPLICATION
SEEKING RELIEF FROM THE AUTOMATIC STAY**

Upon the Certification of Lucas Ordonez, Money Movement Executive for ADP TotalSource, Inc. ("TotalSource"), dated April 9, 2024, and upon TotalSource's Motion (the "Motion") Seeking Relief From the Automatic Stay to Permit Cancellation of TotalSource's Client Services Agreement ("CSA") entered into with Menotti Enterprises, LLC ("Debtor"), dated May 5, 2020, it appearing that TotalSource will be suffering ongoing losses due to the Debtor's ongoing unwillingness or inability to fully fund its gross payroll obligations, employee insurance premiums and service fees due to TotalSource, it appearing that the Debtor is also interested in terminating the CSA in order to minimize its post-petition operating expenses, it appearing that TotalSource seeks to schedule a hearing on the Motion on the earliest possible date in order to minimize TotalSource's post-petition administrative claims herein, and for good cause it is

ORDERED, that the hearing upon the Motion shall be conducted before the Honorable Sean H. Lane at the United States Courthouse located at 300 Quarropas Street, White Plains, New York on _____, at _____ o'clock in the _____ noon, or as soon thereafter as counsel may be heard, and it is further

ORDERED, that the Motion will be conducted by Zoom for Government, and it is further

ORDERED, that all objections to the Motion shall be served and filed by no later than _____, _____, and it is further

ORDERED, that this Order, together with all other pleadings submitted in support of the Motion, to the extent not already served, shall be served upon the Debtor, the Subchapter V Trustee and the Office of the United States Trustee by _____mail within _____ days hereof.

Dated: April , 2024
White Plains, New York

Honorable Sean H. Lane
United States Bankruptcy Judge